

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE INTEL CORP. MICROPROCESSOR
ANTITRUST LITIGATION

MDL No. 05-1717-JJF

PHIL PAUL, on behalf of himself
and all others similarly situated,

Plaintiffs,

v.

INTEL CORPORATION,

Defendant.

C.A. No. 05-485-JJF

CONSOLIDATED ACTION

**CERTIFICATION OF BREE HANN IN SUPPORT OF
DEFENDANT INTEL CORPORATION'S REQUEST TO COMPEL
CLASS PLAINTIFFS TO PRODUCE DOCUMENTS**

I, Bree Hann, make this certification pursuant to Local Rule 7.1.1 and state that the following efforts and exchanges have been made by Intel Corporation ("Intel") to reach agreement on the subject of the accompanying letter brief:

1. On February 23, 2007, my colleague, Todd Pickles, wrote to Douglas Park, one of class plaintiffs' attorneys, to ask plaintiffs to reconsider their objections to Requests Nos. 8 and 9 from Intel's First Set of Requests for Production. Attached as Exhibit A is a true and correct copy of that letter.

2. On March 2, 2007, Mr. Park responded by letter to Mr. Pickles, stating that plaintiffs would stand on their objections. Attached as Exhibit B is a true and correct copy of that letter.

4. On June 14, 2007, Robert Wozniak, counsel for class plaintiffs, responded by letter to me, again stating that plaintiffs would stand on their objections. Attached as Exhibit D is a true and correct copy of that letter.

5. On July 12, 2007, Intel served its Second Set of Requests for Production. That same day, I wrote to Mr. Wozniak and Mr. Park to ask if plaintiffs intended to stand on similar objections. Attached as Exhibit E is a true and correct copy of that letter.

6. On July 24, 2007, after receiving plaintiffs' responses and objections to Intel's Second Set of Requests for Production, I wrote to Mr. Wozniak and Mr. Park to reiterate Intel's position that the requests were relevant and to advise them that if plaintiffs did not intend to alter their position, Intel intended to seek relief from Judge Poppiti. Attached as Exhibit F is a true and correct copy of that letter.

Dated: July 31, 2007

Respectfully submitted,

By: /s/ Bree Hann

Bree Hann
BINGHAM McCUTCHEN LLP
Attorneys for Defendant
INTEL CORPORATION

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Richard L. Horwitz, hereby certify that on July 31, 2007, the attached document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF:

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I hereby certify that on July 31, 2007, I have Electronically Mailed the attached document to the following non-registered participants:

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Dated: May 29, 2007
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